

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAUL IACOVACCI,

Plaintiff,

v.

BREVET HOLDINGS, LLC, *a Delaware Limited Liability
Company et al.*,

Defendants.

Case No. 1:18-cv-08048-MKV

Declaration of Mei-Li da Silva Vint

I, Mei-Li da Silva Vint, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Chief Compliance Officer of defendant Brevet Capital Management, LLC, the SEC-registered investment advisor owned by defendant Brevet Holdings, LLC, and appointed by parties including defendant Brevet Short Duration Partners, LLC, which is a subsidiary of defendant Brevet Short Duration Holdings LLC (collectively, “Brevet,” or “Defendants”).

2. I submit this declaration in support of Brevet’s letter motion to seal permanently selected exhibits or portions thereof cited in Plaintiff’s Reply Memorandum of Law in Further Support of Plaintiff’s Motion for Partial Summary Judgment as those exhibits include trade secrets, confidential business information and/or non-public information of non-parties.

3. Exhibits 187, 188, 189, 190, 199, and 202 include information constituting and/or regarding Brevet’s confidential trade secrets, including but not limited to presentation material

(Monticciolo Oct. 7, 2021 Dep. Tr. at 422:19), policies and procedures (*id.* at 423:6-17), closing transaction policies (*id.* at 423:23-24), and corporate structure (*id.* at 423:21-22).

4. Brevet does not publicly disclose any the information Brevet seeks to file under seal. Brevet preserves the secrecy of its trade secrets by using a variety of different means, including by issuing written policies and protocols and entering into explicit contracts to ensure that the confidentiality is respected.

5. The disclosure of Brevet's trade secrets would place Brevet at a competitive disadvantage by allowing competitors to use that information to compete better with Brevet without expending similar resources.

6. Exhibits 187, 188, 189, 190, 191, 199, 200 and 202 include Brevet's confidential business information, including information about Brevet's business model and strategies, Brevet's corporate structure, information regarding Brevet's transactions, the identity of Brevet's clients, Brevet's internal presentations and presentations provided to investors, and Brevet's policies and handbooks.

7. Similar to Brevet's trade secrets, Brevet does not disclose publicly its confidential business information. To preserve the confidentiality of its business information Brevet uses a variety of different means, including issuing written policies and protocols. Brevet also enters into explicit contracts, including those with Mr. Iacovacci, to protect against the disclosure of its confidential information. Brevet also limits the disclosure of its business information to those who are also in Brevet's regulated space, as they must follow the same confidentiality restrictions as Brevet.

8. Brevet considers its clients to be all of the investors and borrowers with which it has a relationship and keeps confidential the identities of Brevet's past and/or prospective clients, including past and/or prospective investors and transaction counterparties.

9. The disclosure of Brevet's confidential business information will place Brevet at a competitive disadvantage by allowing competitors to use that information to compete better with Brevet without expending similar resources and efforts.

10. Exhibit 188 is FCS Advisors, Inc.'s Employee Handbook. FCS Advisors, Inc. is the corporate predecessor of the entity currently known as Brevet Capital Advisors, LLC, an affiliate of Brevet. This document is treated as confidential and is not publicly disclosed by FCS or Brevet.

11. Exhibit 191 includes non-public information related to third parties. Specifically, Exhibit 191 contains personal information regarding Brevet's employees. Brevet does not publicly disclose non-public, personally identifiable information of its former or current employees, including any personal information regarding the terms and details of the employment of those employees.

I hereby declare under penalty of perjury that the foregoing is true and correct.

[SIGNATURE PAGE FOLLOWS]

Dated: New York, New York
July 5, 2022

A handwritten signature in black ink, appearing to read 'Mei-Li Da Silva Vint', written over a horizontal line.

MEI-LI DA SILVA VINT